REMARKS/ARGUMENTS

Claims 1-73 and 75-98 are pending, of which claims 1, 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97 are independent. Claims 1, 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97 have been amended. No claims have been added or cancelled.

The Applicants thank the Examiner for the acknowledgement of the Information Disclosure Statement (IDS) filed on October 18, 2000 and request acknowledgement of the IDS filed on March, 12, 2002.

Claims 1-18 are rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. While the Applicants respectfully point to page 36, line 20 - page 37, line 6 of the specification for support of independent claim 1 before amendment in this response, the Applicants have amended independent claim 1 to recite: "a plurality of smartcards for providing access to one or more predetermined applications, wherein each of the plurality of smartcards provides a first plurality of security information that is in addition to a second plurality of security information that was provided upon login to the client subsystem." The Applicants point to page 36, line 20 - page 37, line 6 of the specification as an example of text providing support for amended independent claim 1. Accordingly, the rejections to claims 1-18 under 35 U.S.C. §112, first paragraph, are overcome. The Applicants respectfully request that these rejections be withdrawn.

Claims 1-73 and 75-98 are rejected under 35 U.S.C. §112, second paragraph, as being indefinite regarding the use of the

term "certain" in independent claims 1, 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97, and in their corresponding dependent claims.

The Applicants have amended independent claims 1, 19, 36, 50, 59, 64, 70, 75, 91, 93, 95 and 97 to recite, in part: "wherein access to <u>the user account information</u> depends upon the predetermined authorization level." (Emphasis Added).

The Applicants believe that the 35 U.S.C. 112, second paragraph rejections to claims 1-73 and 75-98 have been overcome and respectfully request that these rejections be withdrawn.

Claims 1-7 and 9-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr. (U.S. 6,105,063) ("Hayes") and further in view of Gupta et al. (U.S. 6,226,752) ("Gupta"). Claim 8 is rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr., (U.S. 6,105,063) ("Hayes") as applied to claims 19, 36 and 50 and in further view of Kennedy (U.S. 6,134,582) ("Kennedy"). Claims 19-25, 27, 30-39, 41, 44-51, 53, 55-70, 73 and 91-96 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr., (U.S. 6,105,063) ("Hayes"). Claims 26, 40 and 52 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr., (U.S. 6,105,063) ("Hayes") as applied to claims 19, 36 and 50 and in further view of Kennedy (U.S. 6,134,582) ("Kennedy"). Claims 71 and 72 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr., (U.S.

6,105,063) ("Hayes") as applied to claim 70 and in further view of Kara (U.S. 6,233,568) ("Kara"). Claims 28, 29, 42, 43 and 54 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr., (U.S. 6,105,063) ("Hayes") as applied to claims 19, 36 and 50 and in further view of Tanaka (U.S. 6,385,654) ("Tanaka"). Claims 75-90, 97 and 98 are rejected under 35 U.S.C. 103(a) as being unpatentable over Lewis et al. (U.S. 6,233,565) ("Lewis") in view of Hayes Jr., (U.S. 6,105,063) ("Hayes") and Remington et al. (U.S. 6,070,150) ("Remington"). The Applicants submit that all of the pending claims in this application are patentably distinguishable over the cited references, and reconsideration and allowance of the pending claims are respectfully requested.

Amended independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97 recite, in part: "a plurality of smartcards for providing access to one or more predetermined applications, wherein each of the plurality of smartcards provides a first plurality of security information that is in addition to a second plurality of security information that was provided upon login to the client subsystem." (Emphasis Added).

The Applicants can find no teaching or suggestion, alone or in combination, of the above limitations in the cited references.

The Applicants agree with the Examiner that neither Lewis nor Hayes teach or suggest "using smart cards to logon to a computer." The Applicants also assert that neither Lewis nor Hayes teach or suggest the limitation of amended claims 1, 36,

50, 64, 70, 75, 91, 93, 95 and 97: "a plurality of smartcards for providing access to one or more predetermined applications, wherein each of the plurality of smartcards provides a first plurality of security information that is in addition to a second plurality of security information that was provided upon login to the client subsystem." (Emphasis Added).

The Examiner suggests that Gupta cures this deficiency. However, the Applicants can find no teaching or suggestion in Gupta that cures this deficiency.

Gupta, as cited by the Examiner, teaches an application server communicating with a login server to verify that a user has authenticated itself at the login server before allowing the user to access an application. (Abstract). The application server requires no additional security information beyond that provided to login in order to allow access to the application. (See Abstract).

Additionally, as cited by the Examiner, Gupta teaches the use of a smartcard as the sole authentication mechanism for gaining access to both a system and application. (See Col. 4, lines 30-40; col. 5, lines 13-33). Gupta does not teach "a plurality of smartcards for providing access to one or more predetermined applications, wherein each of the plurality of smartcards provides a first plurality of security information that is in addition to a second plurality of security information that was provided upon login to the client subsystem." (Emphasis Added).

Accordingly, independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97 are patentably distinguishable over Lewis in view of Hayes and further in view of Gupta.

Claims 2-18, 37-49, 51-58, 65-69, 71-73, 76-90, 92, 94, 96 and 98 depend from independent claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97, respectively. As such, these dependent claims necessarily incorporate the limitations of their respective independent claims and are therefore patentable at least for the reasons presented above for claims 1, 36, 50, 64, 70, 75, 91, 93, 95 and 97, as well as for their additional limitations.

Amended independent claim 19 recites, in part: "a plurality of devices configured to receive information for biometric verification, wherein upon obtaining biometric verification, access to one or more predetermined system applications is provided." (Emphasis Added).

Support for the limitation is provided at page 36, line 20 - page 37, line 6 of the specification.

The Applicants can find no teaching or suggestion, alone or in combination, of the above limitations in the cited references.

Accordingly, independent claim 19 is patentably distinguishable over Lewis in view of Hayes.

Claims 20-35 depend from independent claim 19. As such, these dependent claims necessarily incorporate the limitations of claim 19 and are therefore patentable at least for the reasons presented above for claim 19 as well as for their additional limitations.

Amended independent claim 59 recites, in part: "a withdrawal processing support code to allow the support personnel to provide meter refund and withdrawal processing support to a user <u>and to access the client subsystem after a user has tried unsuccessfully to process a meter refund or withdrawal</u>. . . ." (Emphasis Added).

Support for the limitation is provided at page 36, lines 20-25 and page 40, line 20 - page 41, line 25 of the specification.

The Applicants can find no teaching or suggestion, alone or in combination, of the above limitations in the cited references.

Accordingly, independent claim 59 is patentably distinguishable over Lewis in view of Hayes.

Claims 60-63 depend from independent claim 59. As such, these dependent claims necessarily incorporate the limitations of claim 59 and are therefore patentable at least for the reasons presented above for claim 59 as well as for their additional limitations.
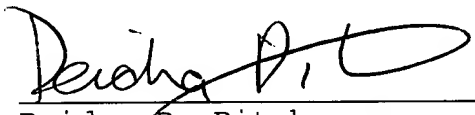
In view of the above amendments and remarks it is submitted that the claims are patentably distinct over the cited references and that all the rejections to the claims have been overcome. Reconsideration and reexamination of the above Application is requested.

Respectfully submitted,

CHRISTIE, PARKER & HALE, LLP

By _____
Deidra D. Ritcherson
Reg. No. 55,574
626/795-9900

DDR/ab

AB PAS672201.1-*-03/29/06 5:16 PM